

Remarks

Reconsideration and allowance are respectfully requested in view of the above amendments and the following remarks. By the present Amendment, the specification, abstract, FIGS. 2 and 14, and claims 1, 28, and 39 have been amended, claim 40 has been cancelled, and claims 41-51 have been added. No new matter is believed added.

Claims 3-4, 6-9, and 12-17 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants gratefully acknowledge the Examiner's indication of allowable subject matter. Accordingly, claims 3, 6, and 12 have been rewritten into independent form as new independent claims 41, 42, and 46, respectfully. Accordingly, Applicants respectfully submit that claims 41-51 are allowable.

Claims 1-2, 5, 10-11, 18-23, and 28-35 are rejected under 35 U.S.C. 102(b) as being anticipated by Iizuka (US 4,815,723).

The above rejection is defective because Iizuka fails to teach each and every feature of the claims as required by 35 U.S.C. 102. For example, regarding independent claim 1, Iizuka fails to disclose, *inter alia*, a "peeling system including a

pair of rotatable belts, wherein the stack of printing plates is located between the rotatable belts, a plurality of plate feed beams attached to, and extending between, the pair of rotatable belts, and a drive system for rotating the pair of rotatable belts to displace the plurality of plate feed beams between the top printing plate and an underlying printing plate in the stack of printing plates, thereby peeling the top printing plate from the stack of printing plates." Claim 28 includes a similar feature. On the contrary, Iizuka discloses that the stack of exposed photosensitive plates 10 are located **outside** of the pair of chains 2 (see, e.g., FIGS. 2 and 7). It should also be noted that Iizuka's photosensitive plates 10 have already been exposed (e.g., using a scanning system or the like), whereas the printing plates of claim 1 (and claim 28) are **unexposed**.

Accordingly, since Iizuka fails to teach each and every feature of independent claims 1 and 28, Applicants respectfully submit that claims 1-38 are allowable.

Claims 25-27 and 37-38 are rejected under 35 U.S.C. 103(a) as being unpatentable over Iizuka in view of Kawada et al. (US 6,164,204), hereafter "Kawada."

Claims 25-27 and 37-38 are allowable for at least the reasons set forth above with regard to independent claims 1 and

28, respectfully. In addition, one of ordinary skill in the art would not be motivated to combine the references of Iizuka and Kawada as proposed by the Examiner.

In section 13 of the above-referenced Office Action, the Examiner asserts that "it would have been obvious to one of ordinary skill in the art to provide the processing machine of Iizuka to include a support surface, a mounting system and a scanning system for imaging each plate fed from the stack as taught by Kawada et al. to provide an efficient feeding system for in-process imaging of printing plates held on a rotatable drum." Applicants respectfully disagree with the Examiner's conclusion. In particular, the printing plates of Iizuka have already been exposed by a scanning system prior to being transported into the automatic developing station 11, 1012 (see, e.g., Abstract, lines 1-4). Iizuka's automatic developing station 11, 1012, receives an exposed printing plate from the autofeeding system and performs a **developing** process on the plate to prepare the plate for use on a printing press (see, e.g., col. 1, lines 24-27).

Claim 39 is rejected under 35 U.S.C. 102(b) as being anticipated by Beisel et al. (US 5,443,006), hereafter "Beisel." Claims 24, 36, and 40 are rejected under 35 U.S.C. 103(a) as

being unpatentable over Beisel in view of Iizuka.

The cassette of claim 39 includes a peeling system that comprises a "pair of rotatable belts, wherein the stack of printing plates is located between the rotatable belts, a plurality of plate feed beams attached to, and extending between, the pair of rotatable belts, and a drive system for rotating the pair of rotatable belts to displace the plate feed beams between the top printing plate and the underlying printing plate in the stack of printing plates, thereby peeling the top printing plate from the stack of printing plates." Beisel fails to disclose such a "peeling system."

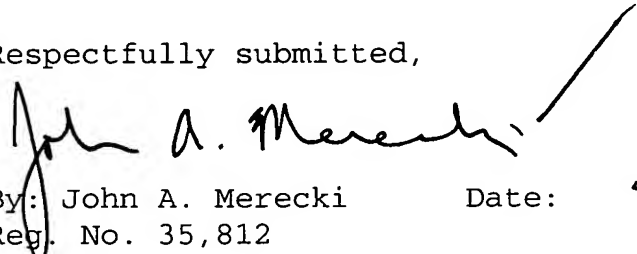
Beisel discloses a device for removing used printing plates from the plate cylinder of a printing press, and for supplying new printing plates to the plate cylinder. Unlike the peeling system of the present invention, however, Beisel's plate-removing apparatus 13 and plate-supplying apparatus 16 employ suction elements 18, 56, respectfully, to transport the printing plates relative to the magazine 4. Clearly, Beisel fails to disclose the claimed "peeling system" of the present invention.

Claims 24, 36, and 40 are allowable because both Beisel and Iizuka, as detailed above, fail to teach or suggest the claimed "peeling system."

Applicants respectfully submit, therefore, that claims 1-39 and 41-51 are in condition for allowance.

If the Examiner believes that any further discussion of the invention would be helpful, perhaps in the form of an Examiner's Amendment, Applicants' representative is available at (518) 449-0044, and earnestly solicits such discussion.

Respectfully submitted,


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